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REMARKS

Responsive to the Office Action mailed June 14, 2006, Applicants provide the following. Twenty-six (26) claims remain pending: claims 21-34 and 36-47. Applicants respectfully request reconsideration of claims 21-34 and 36-47 in view of the remarks below.

By way of this amendment, Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the Examiner telephone the undersigned at (858) 552-1311 so that such issues may be resolved as expeditiously as possible.

Claim Rejections - 35 U.S.C. § 103

1. Claims 21-23, 26-28 and 45-46 stand rejected under 35 U.S.C. §103(a), as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent Application Publication No. 2003/0204847 (Ellis et al.) in further view of U.S. Patent No. 6,865,746 (Herrington et al.). Applicants respectfully traverse these rejections, and further submit that claims 21-23, 26-28 and 45-46 are not obvious over the combination of above references.

More specifically, for example, claim 21 recites in part "a key word and a first code ... requesting a searching of a network for information relating to the keyword ... and receiving the information including the preselected information relating to the keyword". The office action suggests that a first code that is preassociated with preselected information relating to the keyword prior to receiving the keyword is taught by the combination of the Dodson patent and the Ellis publication. Applicants respectfully submit, however, that the combination fails to teach each limitation as recited in claim 21.

The combination of the Dodson, Ellis and Herrington references, if arguendo one were to combine these references, does not teach or suggest each of the limitations as recited in claim 21. For example, claim 21 recites in part "requesting a searching of a network for information relating to the keyword; and receiving the information including the preselected information relating to the key word." The combination of Dodson, Ellis and Herrington does

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not result in at least receiving information related to the key word as recited in claim 21 and instead would at best only provide a search of information relating to search term, where the information relating to the search term is forwarded to a third party and not received by the user. Specifically, Dodson only describes supplying "automatic search terms to be searched" (Dodson, col. 3, lns. 8-10), where the automatic search terms are not preassociated with preselected data, and are instead used to search for information not available and is not associated with preselected information (col. 4, lns. 42-51). Furthermore, the office action specifically states that Dodson fails to teach a "first code that is preassociated with preselected information relating to the key word prior to receiving the key word" and relies on Ellis (Office Action, pg. 3).

The office action suggests that Ellis teaches this limitation "by the use of product identification information to identify the product or service for acquiring additional information" (Office Action, pg. 3). However, the product identification information in Ellis reference is included "with the user's request to identify the product or service ordered," and is provided to the headend to be processed (Ellis, para. 0236). Therefore, Ellis specifically requires that information associated with the product identification (which the office action equates to a "keyword") is not returned to the user upon selecting the "keyword" but instead is forwarded to an external, third party. As such, the Ellis reference only describes that a selection of a "keyword" forwards information to an external, third entity, and fails to teach or suggest information being forwarded to the user. Therefore, the combination of Dodson and Ellis would at best provide the forwarding of information to a third party and does not result in the user receiving any preselected information in response to the search, because Ellis describes that the product information is sent to be received by some external entity and nothing is returned to the user (Ellis, para. 0236). Therefore, the combination of the Dodson and Ellis references fails to teach all of the elements of claim 21. The Herrington reference also fails to teach or suggest at least "a key word and a first code preassociated with preselected information relating to the keyword ... requesting a searching of a network for information relating to the keyword ... and receiving the information including the preselected information relating to the keyword". Therefore, a *prime facie* case of obviousness has not been established by the combination of the

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Dodson, Ellis, and Herrington as suggested by the office action because the combination fails to teach each of the limitations as recited in claim 21, and thus, claim 21 is in condition for allowance.

Further, one skilled in the art would not combine the Ellis reference and the Dodson patent because the purpose of the Dodson reference is to provide search terms to access external data not available with the content, while the Ellis reference teaches product identifiers that are received and stored with the content. There would be no motivation to combine the references since Dodson already describes having local data available with the content, "current program title, the actors starring in the program, the start time, and the end time" (see Dodson, col. 2, lns. 59-64). Further, Dodson teaches away from storing all of the data with the content as described by the Ellis reference since the Dodson patent states that having all channel information in one place "can be awkward and frustrating to the user" (see Dodson, col. 1, lns. 39-51). The Dodson reference teaches away from "static T.V. model of centralized channel information" where "all channel information is in one place" and instead describes "a system and methods which avoids these problems in the conventional system for displaying TV program information" (Dodson, col. 1, lns. 38-55). In contrast, the Ellis reference describes receiving program schedule information and storing the information in a memory on the client device (see Ellis, para. 0036, 0230). As such, the system described in Dodson teaches away from receiving and having to store all of the information as with the system described in Ellis. Therefore, one skilled in the art would not combine the Dodson patent with the Ellis publication. As such, claim 21 is not rendered obvious in view of Ellis, Herrington and Dodson.

Claim 45 includes language similar to the language of claim 21. Therefore, claim 45 is also not obvious over the combination of Dodson, Ellis, and Herrington at least for the reasons described above with respect to claim 21, and thus, are in condition for allowance.

Claims 22-23, 26-28 depend from independent claim 21, and claim 46 depends from independent claim 45. Therefore, claims 22-23, 26-28 and 46 are also in condition for allowance at least due to their dependence on claims 21 and 45.

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2. Claims 24, 29-30, 37, 39-41 and 43-44 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent Application Publication No. 2003/0204847 (Ellis et al.) and U.S. Patent No. 6,865,746 (Herrington et al) and in further view of U.S. Patent No. 6,499,057 (Portuesi). This rejection is respectfully traversed and reconsideration is requested.

Claims 24 and 29-30 depend from claim 21. As demonstrated above, the combination of Dodson, Ellis and Herrington fails to teach or suggest each of the limitations recited in claim 21. The Portuesi patent also fails to teach "a key word and a first code preassociated with preselected information relating to the keyword ... requesting a searching of a network relating to the keyword ... receiving the information including the preselected information relating to the keyword," and therefore does not provide any teaching or suggestion that, taken with the combination of Dodson, Ellis and Herrington, renders claim 21 obvious. Therefore, a *prima facie* case of obviousness is not met with regard to at least dependent claims 24 and 29-30.

Furthermore, claim 37 recites elements similar to those found in claims 21 and 45. Accordingly, arguments presented above with respect to the rejection of claims 21 and 45 are also applicable to the rejection of claim 37. For at least these reasons, the combination of Dodson, Herrington, Ellis, and Portuesi fails to teach or suggest at least the aforementioned elements as presently recited in claim 37. Accordingly, Applicants respectfully submit that claim 37 and claims 39-41, 43, and 44, which depends from claim 37, are not rendered *prima facie* obvious in light of the combined references.

3. Claim 25 stands rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent Application No. 2003/0204847 (Ellis et al.) and U.S. Patent No. 6,865,746 (Herrington et al) in further view of U.S. Patent No. 5,819,284 (Farber et al.). This rejection is respectfully traversed and reconsideration is requested.

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Claim 25 depends from claim 21. As demonstrated above, the combination of Dodson and Herrington fails to teach or suggest each of the limitations as recited in claim 21. Farber also fails to teach at least those limitations as demonstrated above as not being taught by the combination of Dodson, Ellis and Herrington, and does not provide any teaching or suggestion that, taken with the combination of Dodson and Herrington, renders claim 21 obvious. Therefore, a *prima facie* case of obviousness is not met with regard to at least dependent claim 25.

4. Claim 42 stands rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent Application Publication No. 2003/0204847 (Ellis et al.) and U.S. Patent No. 6,865,746 (Herrington et al) in further view of U.S. Patent No. 5,819,284 (Farber et al.) and U.S. Patent No. 6,499,057 (Portuesi). This rejection is respectfully traversed and reconsideration is requested.

Claim 42 ultimately depends from claim 37. As demonstrated above, the combination of Dodson, Ellis, Herrington, and Portuesi fails to teach or suggest each limitation as recited in claim 37. Farber also fails to teach at least "a key word and a first code preassociated with preselected information relating to the keyword ... requesting a searching of a network for information relating to the keyword ... and receiving the information including the preselected information relating to the keyword," and therefore, does not provide any teaching or suggestion that, taken with the combination of Dodson, Ellis, Herrington, and Portuesi, renders claim 37 obvious. Therefore, a *prima facie* case of obviousness is not met with regard to at least dependent claim 42.

5. Claims 31-34 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent App. Pub. No. 2004/0040042 (Feinleib) and U.S. Patent No. 6,240,555 (Shoff et al.), in further view of U.S. Patent No. 6,499,057 (Portuesi). Applicants respectfully traverse these rejections.

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With regard to at least claim 31, the combination of applied references does not teach at least “receiving keywords comprising a unique identifier of the storage medium associated with the video image over a second communication channel” as recited in claim 31. The Examiner specifically states that “the Dodson et al. and Feinleib combination does not specifically teach ‘keywords comprising a unique identifier of the storage medium’” (Office Action, pg. 17), and instead relies upon the system described in Shoff. The office action specifically suggests that the use of a unique identifier of the storage medium is inherent to the successful disk reads of content from the local storage device (Office Action, pg. 17). However, there is no suggestion or teaching of a unique identifier of the storage medium in Shoff, nor is the use of a unique identifier necessary or inherent for the successful disk reads of content from the local storage medium, as content can be read from the medium without an identifier. Therefore, the combination of Dodson, Feinleib, Shoff and Portuesi fails to teach or suggest at least the aforementioned elements as recited in claim 31. Accordingly, Applicants respectfully submit that claim 31 and claims 32-34, which depend from claim 31, are not rendered *prima facie* obvious in light of the combined references.

Claims 32-34 depend upon claim 31, and therefore, are also not obvious over the combination of the Dodson, Feinleib, Shoff and Portuesi references at least for the reason described above with respect to claim 31.

6. Claim 36 stands rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,184,877 (Dodson et al.) in view of U.S. Patent Application No. 2004/0040042 (Feinleib) in further view of U.S. Patent No. 6,240,55 (Shoff et al.), U.S. Patent No. 6,499,057 (Portuesi), and U.S. Patent No. 5,819,284 (Farber et al.).

Claim 36 depends from claim 31. As demonstrated above, the combination of Dodson, Feinleib, Shoff, and Portuesi fails to teach or suggest each element of claim 31. Farber also fails to teach or suggest at least “receiving keywords comprising a unique identifier of the storage medium...” as recited in claim 31. Therefore, the combination of Dodson, Feinleib,

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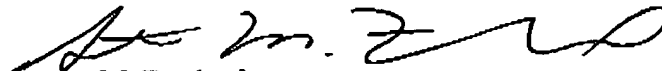
Shoff, Portuesi, and Farber does not render claim 31 obvious, and thus, a *prima facie* case of obviousness is not met with regard to dependent claim 36.

CONCLUSION

Applicants respectfully submit that the above remarks place the pending claims in a condition for allowance. Therefore, a Notice of Allowance is respectfully requested.

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Respectfully submitted,



Steven M. Freeland
Reg. No. 42,555
Attorney for Applicants
(858) 552-1311

Address all correspondence to:
FITCH, EVEN, TABIN & FLANNERY
Thomas F. Lebens
120 So. LaSalle Street, Ste. 1600
Chicago, IL 60603
(858) 552-1311

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